

Message

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**From:** Blenner, Diane [Diane.Blenner@dsm.com]  
**Sent:** 4/27/2020 2:57:20 PM  
**To:** Buckley, Christopher [buckley.christopher@epa.gov]  
**CC:** Schweer, Greg [Schweer.Greg@epa.gov]; Edelstein, Rebecca [Edelstein.Rebecca@epa.gov]; Tierney, Meghan [Tierney.Meghan@epa.gov]  
**Subject:** RE: PMN P-16-XXXX priority for DSM

For Internal Use Only

Mr. Buckley,

I hope you are well.

I am following up regarding the status of the determination letter. Last you spoke to my colleague Brian Perry, you had indicated that the assessment would be completed on Friday March 6. The assessment was expected to be sent to an operations meeting the following week, which would result in a determination letter. The week after, week of March 16, it was expected that the determination would be signed. Also stated was that the determination letter would be expected to be sent by the end of March.

Presently we have not received a determination letter. Could you please indicate the status of the PMN?

We had also requested in the previous email a copy of the Risk Assessment report. Could you please address if we can receive a copy?

Kind regards,  
Diane

Diane Blenner | Senior Product Registration Expert Regulatory Affairs & Product Safety | Product Registration and Chemical Inventory Team  
| Center of Expertise for DSM Materials | 730 Main St Wilmington, MA 01887 USA | M 978.761.4238 | diane.blenner@dsm.com |

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**From:** Perry, Brian <Brian.Perry@dsm.com>  
**Sent:** Friday, March 6, 2020 4:07 PM  
**To:** Buckley, Christopher <buckley.christopher@epa.gov>  
**Cc:** Blenner, Diane <Diane.Blenner@dsm.com>; Schweer, Greg <Schweer.Greg@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Tierney, Meghan <Tierney.Meghan@epa.gov>  
**Subject:** RE: PMN P-16-XXXX priority for DSM

For Internal Use Only

Mr. Buckley,


Thank you for the call yesterday to discuss the approximate timing of the determination letter, signing and sending. As you indicated, the RAD assessment and report would be finished today. Would you be able to provide DSM with a copy of the report? You can fax it to us at 978-657-7978.

Also, as of Monday, March 9, Diane Blenner (cc'd) will be the DSM contact person for this PMN. Her contact information is the following:

Diane Blenner  
Regulatory Affairs Senior Expert  
DSM Coating Resins, Inc.  
730 Main Street  
Wilmington, MA 01887  
Cell: 978-761-4238  
Email: [diane.blenner@dsm.com](mailto:diane.blenner@dsm.com)

Kind Regards,

Brian

Brian Perry | Regulatory Affairs - Senior Product Registration Expert | Resins and Functional Materials | 730 Main St Wilmington, MA 01887  
USA | T 978-661-7373 | M 978-495-2259 | [brian.perry@dsm.com](mailto:brian.perry@dsm.com) | Stay connected: 



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**From:** Schweer, Greg <[Schweer.Greg@epa.gov](mailto:Schweer.Greg@epa.gov)>  
**Sent:** Wednesday, March 4, 2020 7:28 AM  
**To:** Perry, Brian <[Brian.Perry@dsm.com](mailto:Brian.Perry@dsm.com)>  
**Cc:** Blenner, Diane <[Diane.Blenner@dsm.com](mailto:Diane.Blenner@dsm.com)>; Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>; Edelstein, Rebecca <[Edelstein.Rebecca@epa.gov](mailto:Edelstein.Rebecca@epa.gov)>; Tierney, Meghan <[Tierney.Meghan@epa.gov](mailto:Tierney.Meghan@epa.gov)>  
**Subject:** RE: PMN P-16-XXXX priority for DSM

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Thanks Brian. We will communicate with Diane on future communications. Good luck in your new role.

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**From:** Perry, Brian <[Brian.Perry@dsm.com](mailto:Brian.Perry@dsm.com)>  
**Sent:** Wednesday, March 04, 2020 7:04 AM  
**To:** Schweer, Greg <[Schweer.Greg@epa.gov](mailto:Schweer.Greg@epa.gov)>  
**Cc:** Blenner, Diane <[Diane.Blenner@dsm.com](mailto:Diane.Blenner@dsm.com)>; Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>; Edelstein, Rebecca <[Edelstein.Rebecca@epa.gov](mailto:Edelstein.Rebecca@epa.gov)>; Tierney, Meghan <[Tierney.Meghan@epa.gov](mailto:Tierney.Meghan@epa.gov)>  
**Subject:** RE: PMN P-16-XXXX priority for DSM

For Internal Use Only

Mr. Schweer,

Yes, please add an additional 15-day suspension. We will follow-up for an update in a couple weeks time if we do not already hear from the EPA about this case.

I'd also like to point out that my colleague, Diane Blenner, will be continuing contact with you regarding this PMN after this week. She has been copied on the email communications regarding this PMN and did also submit an amendment for it earlier last year in 2019. I will be transitioning roles internally within DSM and this PMN matter will be transferred to Ms. Blenner.

Kind Regards,

Brian

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**From:** Schweer, Greg <[Schweer.Greg@epa.gov](mailto:Schweer.Greg@epa.gov)>

**Sent:** Tuesday, March 3, 2020 3:35 PM

**To:** Perry, Brian <[Brian.Perry@dsm.com](mailto:Brian.Perry@dsm.com)>

**Cc:** Blenner, Diane <[Diane.Blenner@dsm.com](mailto:Diane.Blenner@dsm.com)>; Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>; Edelstein, Rebecca <[Edelstein.Rebecca@epa.gov](mailto:Edelstein.Rebecca@epa.gov)>; Tierney, Meghan <[Tierney.Meghan@epa.gov](mailto:Tierney.Meghan@epa.gov)>

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Brian,

I rec'd your voice message and contacted the Coordinator in the Risk Assessment Division this afternoon about the status of the hazard/risk assessment report. Apparently, the senior risk assessor assigned to the case was out of the office for two weeks in February but has now returned. His new manager directed him today to give priority to completing this assessment. I apologize for the delay. I hope that RAD can complete this case within the next two weeks. The Day 90 is today. I presume that you want another 15-day suspension, right?

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**From:** Schweer, Greg

**Sent:** Friday, January 31, 2020 7:48 AM

**To:** Perry, Brian <[Brian.Perry@dsm.com](mailto:Brian.Perry@dsm.com)>

**Cc:** Blenner, Diane <[Diane.Blenner@dsm.com](mailto:Diane.Blenner@dsm.com)>; Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>; Edelstein, Rebecca <[Edelstein.Rebecca@epa.gov](mailto:Edelstein.Rebecca@epa.gov)>; Tierney, Meghan <[Tierney.Meghan@epa.gov](mailto:Tierney.Meghan@epa.gov)>

**Subject:** RE: PMN P-16-XXXX priority for DSM

Brian,

Once the hazard/risk assessment report has been approved by the Deputy Office Director, the Risk Assessment Division provides that document to my Branch. We then work with the submitter to try to find a way to mitigate any potentially unreasonable risks identified in the hazard/risk assessment. It's hard to predict how much time and effort this will take on the part of both parties until we know the nature of any risks identified.

If no potentially unreasonable risks have been identified, the Program Manager, Chris Buckley for this case, prepares a Recommendation Summary document and a Determination Document for review and signature by the Deputy Office Director. Once that Determination Document is signed, you will be notified and you can then commence manufacture. This process generally takes about 1 week.

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**From:** Perry, Brian <Brian.Perry@dsm.com>  
**Sent:** Thursday, January 30, 2020 3:48 PM  
**To:** Schweer, Greg <Schweer.Greg@epa.gov>  
**Cc:** Blenner, Diane <Diane.Blenner@dsm.com>; Buckley, Christopher <buckley.christopher@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Tierney, Meghan <Tierney.Meghan@epa.gov>  
**Subject:** RE: PMN P-16-XXXX priority for DSM

For Internal Use Only


Mr. Schweer,

Thank you for the update with an approximate timeline; that is helpful for us. We're glad to see that progress is being made on this older case.

I approve a suspension until February 17<sup>th</sup>. What are the next steps after the hazard/risk assessment report has been reviewed by the Deputy Office Director of OPPT?

Kind Regards,

Brian

Brian Perry | Regulatory Affairs - Senior Product Registration Expert | Resins and Functional Materials | 730 Main St Wilmington, MA 01887 USA | T 978-661-7373 | M 978-495-2259 | [brian.perry@dsm.com](mailto:brian.perry@dsm.com) | Stay connected: 



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**From:** Schweer, Greg <Schweer.Greg@epa.gov>  
**Sent:** Thursday, January 30, 2020 3:28 PM  
**To:** Perry, Brian <Brian.Perry@dsm.com>  
**Cc:** Blenner, Diane <Diane.Blenner@dsm.com>; Buckley, Christopher <buckley.christopher@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Tierney, Meghan <Tierney.Meghan@epa.gov>  
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Brian,

I rec'd your voice mail as well this email. I was just in contact with the Coordinator in our Risk Assessment Division. She stated that the human hazard/risk assessment report has been drafted and is undergoing review by a senior health assessor. It will then be reviewed by the Deputy Office Director of OPPT. She stated that they need two more weeks.

Sorry that this has taken so long but we are getting close. Can you give us a suspension of the review period until February 17?

---

**From:** Perry, Brian <[Brian.Perry@dsm.com](mailto:Brian.Perry@dsm.com)>  
**Sent:** Wednesday, January 15, 2020 9:30 AM  
**To:** Schweer, Greg <[Schweer.Greg@epa.gov](mailto:Schweer.Greg@epa.gov)>  
**Cc:** Blenner, Diane <[Diane.Blenner@dsm.com](mailto:Diane.Blenner@dsm.com)>; Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>; Edelstein, Rebecca <[Edelstein.Rebecca@epa.gov](mailto:Edelstein.Rebecca@epa.gov)>  
**Subject:** RE: PMN P-16-XXXX priority for DSM






For Internal Use Only

Mr. Schweer,

Could you provide a status update on this PMN now that we have reached the suspension timeframe of mid-January?  
Thanks.

Kind Regards,

Brian

Brian Perry | Regulatory Affairs - Senior Product Registration Expert | Resins and Functional Materials | 730 Main St Wilmington, MA 01887  
USA | T 978-661-7373 | M 978-495-2259 | [brian.perry@dsm.com](mailto:brian.perry@dsm.com) | Stay connected:     



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**From:** Perry, Brian  
**Sent:** Tuesday, December 31, 2019 10:07 AM  
**To:** Schweer, Greg <[Schweer.Greg@epa.gov](mailto:Schweer.Greg@epa.gov)>  
**Cc:** Blenner, Diane <[Diane.Blenner@dsm.com](mailto:Diane.Blenner@dsm.com)>; Buckley, Christopher <[buckley.christopher@epa.gov](mailto:buckley.christopher@epa.gov)>; Edelstein, Rebecca <[Edelstein.Rebecca@epa.gov](mailto:Edelstein.Rebecca@epa.gov)>  
**Subject:** RE: PMN P-16-XXXX priority for DSM






For Internal Use Only

Mr. Schweer,

Thank you for the update. I'm glad to hear the assessment has been able to move forward. I do authorize the suspension until mid-January in order to proceed with this case.

Kind Regards,

Brian

Brian Perry | Regulatory Affairs - Senior Product Registration Expert | Resins and Functional Materials | 730 Main St Wilmington, MA 01887  
USA | T 978-661-7373 | M 978-495-2259 | [brian.perry@dsm.com](mailto:brian.perry@dsm.com) | Stay connected:     



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**From:** Schweer, Greg <[Schweer.Greg@epa.gov](mailto:Schweer.Greg@epa.gov)>  
**Sent:** Tuesday, December 31, 2019 9:46 AM

**To:** Perry, Brian <Brian.Perry@dsm.com>

**Cc:** Blenner, Diane <Diane.Blenner@dsm.com>; Buckley, Christopher <buckley.christopher@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>

**Subject:** RE: PMN P-16-XXXX priority for DSM

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Brian,

I rec'd your voice mail and checked with the Risk Assessment Division this morning on the status of their assessments. The Exposure Report was completed on December 17 and work will begin on the Hazard/Risk Report in January. Will you authorize a suspension until mid-January to enable this work to proceed?

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**From:** Schweer, Greg

**Sent:** Tuesday, December 10, 2019 3:36 PM

**To:** Perry, Brian <Brian.Perry@dsm.com>; Buckley, Christopher <buckley.christopher@epa.gov>

**Cc:** Blenner, Diane <Diane.Blenner@dsm.com>

**Subject:** RE: PMN P-16-XXXX priority for DSM

Brain,

I made a request of our Risk Assessment Division last Friday to give this case some elevated priority for completion. I just sent another email to them to ask about whether they are granting that request.

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